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10 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
11 **EASTERN DIVISION**

12 PNINA COHEN and SHAUL CHAZON,

13 Plaintiffs,

14 vs.

15 ANIL K. MOHAN, individually, ANIL K.  
MOHAN d/b/a SUBWAY #18966, ANMONE  
16 RESTAURANTEURS, INC., ANMONE  
RESTAURANTEURS d/b/a SWEETOPIA,  
17 COUNTRYSIDE INN ONTARIO, L.P.,

18 Defendants.

Case No.: 17-cv-218-JGB-SP

Discovery Cut-Off: April 18, 2017

**JOINT STIPULATION FOR ORDER TO  
MODIFY NOVEMBER 28, 2017  
SCHEDULING ORDER; [PROPOSED]  
ORDER THEREON**

The Hon. Jesus Bernal

21  
22 Plaintiffs PNINA COHEN and SHAUL CHAZON (“Plaintiffs”) and Defendants ANIL  
23 K. MOHAN, individually, ANMONE RESTAURANTEURS, INC., ANMONE

RESTAURANTEURS d/b/a SWEETOPIA, through their respective undersigned counsel, hereby respectfully submit the following Joint Stipulation and (Proposed) Order to Modify the Court's November 28, 2017 Scheduling Order.

#### **STIPULATION**

WHEREAS the Court issued a Scheduling Order on November 28, 2017 modifying the May 17, 2017 Scheduling Order;

WHEREAS, because Plaintiffs reside in New York State, and the expert discovery and fact discovery is more difficult to obtain due to the distance, the parties need additional time to conduct discovery, including the designation of expert witnesses, and taking depositions of experts, treating physicians and witnesses;

WHEREAS, the parties intend to maintain the same trial date;

WHEREAS, under the Court's Modified Scheduling Order, the date for designation of expert witnesses is March 20, 2018 and the Discovery Cut-Off is April 18, 2018;

WHEREAS, the parties agree that good cause exists to extend the deadlines in the Court's Scheduling Order, issued November 28, 2017, as follows:

<b>Event</b>	<b>Current Date</b>	<b>New Date</b>
Deadline for Initial Designation of Expert Witnesses	3/20/2018	5/3/2018
Deadline for Designation of Rebuttal Expert Witnesses	4/4/2018	5/17/2018
All Discovery Cut-Off	4/18/2018	6/1/2018
Dispositive Motion Hearing Cut-Off	8/20/2018	8/27/2018 at 9:00am
Last day to conduct Settlement Conference	5/29/2018	9/14/2018
Final Pre-Trial Conference	8/27/2018	8/27/2018
Jury Trial	10/09/2018 at 9:00am	10/09/2018 at 9:00am

1 Respectfully submitted,

2 Dated: March 5, 2018

3 **SADOVNIK LEGAL P.C.**

4 /s/Sheila Sadovnik

5 Sheila Sadovnik

Attorneys for PLAINTIFFS

6 Dated: March 5, 2018

7 **LAW OFFICE OF ERIC G. ANDERSON**

8 /s/Tracy Goldberg

9 Tracy Goldberg

Attorneys for ANMONE RESTAURANTEURS,

10 INC., ANMONE RESTAURANTEURS

d/b/a SWEETOPIA

11 Dated: March 5, 2018

12 **THOMPSON & COLEGATE LLP**

13 /s/Gary Montgomery

14 Gary Montgomery

Attorneys for ANIL K. MOHAN